

ROTHBERG

LAW FIRM

P.O. Box 11647 * Fort Wayne, Indiana * 46859-1647

Telephone: (260) 422-9454

Taxpayer ID: 35-0900335

BAADE MANAGEMENT COMPANY, INC.

PAGE: 1
INVOICE DATE: 01/24/2024
ACCOUNT NO: 2021W.10329
INVOICE NO: 219334

RE: CHAPTER 7

FEES

			<u>RATE</u>	<u>HOURS</u>	
04/22/2021	MAW	REVIEW AND SIGN DEMAND LETTER RE: TURNOVER OF BANK ACCOUNTS.	370.00	0.20	74.00
	MAW	REVIEW ACCOUNTS RECEIVABLE AGING.	370.00	0.20	74.00
	MAW	LEGAL RESEARCH RE: MECHANICS' LIEN DEADLINES IN OHIO, MICHIGAN AND ILLINOIS.	370.00	0.40	148.00
	MAW	PHONE CALL WITH DOUG ADELSPERGER RE: GETTING LAST DAY BAADE MGMT. WAS ON BACK OF 2021 JOBS.	370.00	0.20	74.00
04/23/2021	PWS	RESEARCH THE APPLICATION OF 11 USC 108 TO STATE MECHANICS LIEN STATUTES.	250.00	0.80	200.00
04/26/2021	PWS	COMPLETE RESEARCH ON THE APPLICATION OF 11 USC 108 TO STATE MECHANICS LIEN STATUTES; DRAFT SUMMARY AND RECOMMENDATION FOR THE TRUSTEE'S PERFECTION OF LIENS.	250.00	1.10	275.00
05/13/2021	CEW	DRAFT FOLLOW-UP LETTER TO FARMERS STATE BANK.	170.00	0.30	51.00
	MAW	REVIEW AND SIGN FOLLOW-UP DEMAND LETTER TO FARMERS STATE BANK.	370.00	0.20	74.00
05/25/2021	PWS	REVIEW DOCUMENTS SUBMITTED BY BAADE MANAGEMENT TO DETERMINE AMOUNTS OWED AND TIME REMAINING TO COLLECT ON ACCOUNTS.	250.00	0.50	125.00

			<u>RATE</u>	<u>HOURS</u>	
05/26/2021	PWS	REVIEW INVOICES FROM DEBTOR; DRAFT DEMAND LETTERS.	250.00	0.50	125.00
05/27/2021	MAW	VOICEMAIL FROM ATTORNEY ERIC SCHESKE FOR FARMERS STATE BANK.	370.00	0.60	222.00
05/28/2021	PWS	INTERNAL CONFERENCE TO REVIEW ACTIONS NEEDED ON INVOICES; REVIEW RESEARCH ON STATUTORY MINIMUMS UNDER BANKRUPTCY CODE TO BRING AN ACTION AGAINST A FOREIGN ENTITY IN INDIANA.	250.00	0.60	150.00
06/01/2021	PWS	REVIEW INVOICES SENT BY BAADE MANAGEMENT.	250.00	0.40	100.00
	MMH	PREPARE DEMAND LETTERS FOR INVOICES.	135.00	3.00	405.00
06/02/2021	PWS	REVIEW INVOICES SENT BY BAADE MANAGEMENT; CONTINUE TO DRAFT DEMAND LETTERS.	250.00	0.90	225.00
	MAW	PHONE CALL WITH ATTORNEY ERIC SCHESKE FOR FARMERS STATE BANK.	370.00	0.40	148.00
06/03/2021	PWS	CONTINUE TO REVIEW INVOICES SENT BY BAADE MANAGEMENT; CONTINUE TO DRAFT DEMAND LETTERS.	250.00	1.70	425.00
	MAW	REVIEW EMAIL FROM ATTORNEY SCHESKE, REVIEW BANK STATEMENT.	370.00	1.00	370.00
06/04/2021	PWS	FINALIZE AND SEND DEMAND LETTERS TO DELINQUENT ACCOUNTS.	250.00	2.00	500.00
06/07/2021	MAW	CONFERENCE WITH PHIL SMITH RE: STATUS OF COLLECTION EFFORTS.	370.00	0.20	74.00
	MAW	ATTEND CONFERENCE WITH SUSAN TRENT RE: FARMERS STATE BANK ISSUE AND STATUS OF COLLECTION EFFORTS.	370.00	0.20	74.00
	SET	TELEPHONE CONFERENCE WITH DOUG ADELSPERGER RE: FARMERS STATE BANK ACCOUNT; FOLLOW-UP THERETO.	320.00	0.30	96.00
	SET	TELEPHONE CONFERENCE WITH DOUG ADELSPERGER RE: HIS COMMUNICATION WITH HIS CLIENT ON CORPORATE ACCOUNT; FOLLOW-UP TO MARK WARSCH RE: STATUS OF RECEIPT OF FUNDS.	320.00	0.40	128.00
06/10/2021	SET	FOLLOW-UP ON 2004 SUBPOENA TO BANK AND MOTION FOR TURNOVER.	320.00	0.30	96.00

06/11/2021	SET	ATTENTION TO MOTION FOR TURNOVER, 2004 EXAM AND SUBPOENA.	320.00	0.70	224.00
06/14/2021	SET	ATTENTION TO UPDATES TO TURNOVER MOTION AND 2004 EXAM.	320.00	0.60	192.00
06/15/2021	SET	WORK ON 2004 EXAM MOTION.	320.00	0.30	96.00
06/21/2021	SET	REVIEW SUBPOENA AND 2004 EXAM.	320.00	0.70	224.00
06/22/2021	CEW	PREPARE NOTICE OF MOTION FOR TURNOVER.	170.00	0.20	34.00
06/23/2021	CEW	DRAFT SUBPOENA FOR RULE 2004 EXAM.	170.00	0.30	51.00
	MAW	REVIEW AND APPROVE SUBPOENA.	370.00	0.20	74.00
06/24/2021	SET	REVIEW E-MAIL FROM DOUG ADELSPERGER.	320.00	0.20	64.00
06/30/2021	SET	DRAFT LETTER ON ACCOUNT RECEIVABLE OF FAIEK TOMA.	320.00	0.30	96.00
07/07/2021	MAW	PHONE CALL WITH DOUG ADELSPERGER RE: OUTSTANDING REQUESTS.	370.00	0.50	185.00
	MAW	REVIEW EMAIL FROM SUSAN TRENT.	370.00	0.20	74.00
07/19/2021	MAW	REVIEW EMAIL FROM ATTORNEY SCHESKE FOR FARMERS STATE BANK.	370.00	0.30	111.00
07/20/2021	MAW	CONFERENCE WITH SUSAN TRENT RE; BANK ISSUES, RECORDS SUPPLIED, AND RULE 2004 EXAM.	370.00	0.50	185.00
	MAW	VOICEMAIL FROM DOUG ADELSPERGER, RETURN VOICEMAIL RE; \$9,900 FROM BANK.	370.00	0.40	148.00
08/03/2021	MAW	CONFERENCE WITH SUSAN TRENT AND MADDIE RE; REVIEWING BANK STATEMENTS.	370.00	0.40	148.00
	MMH	CREATE A SPREADSHEET OF THE BANK STATEMENTS.	135.00	2.70	364.50
	SET	CONFERENCE WITH MADDIE HEINEY AND MARK WARSOCO RE: INVESTIGATION INTO CHECK/DISBURSEMENTS FROM ACCOUNT.	320.00	0.40	128.00
08/04/2021	MMH	CONTINUE EDITING SPREADSHEET.	135.00	7.20	972.00
08/09/2021	MAW	REVIEW DRAFT OF AGREED ORDERS FROM DOUG ADELSPERGER.	370.00	0.20	74.00
	SET	REVIEW AGREED ORDERS/ REVIEW MOST			

		RECENT CDC ORDER RE: EVICTIONS.	320.00	0.60	192.00
08/10/2021	MAW	CONFERENCE CALL WITH SUSAN TRENT AND DOUG ADELSPERGER RE: BANK ACCOUNT RECORDS.	370.00	0.30	111.00
	MAW	LEGAL RESEARCH RE: EFFECT OF MORATORIUM ON EVICTION ON TRUSTEE'S RIGHT TO POSSESSION.	370.00	1.00	370.00
	BAS	SEARCH INDIANA SECRETARY OF STATE RECORDS FOR FRANK BAADE COMPANIES AND OBTAIN BUSINESS INFORMATION FOR EACH COMPANY. EMAIL TO SUSAN TRENT.	170.00	0.30	51.00
	SET	TELEPHONE CALL WITH DOUG ADELSPERGER AND MARK WARSCH RE: AGREED ORDERS, BUSINESS RECORDS AND RELATED MATTERS.	320.00	0.60	192.00
08/12/2021	MAW	REVIEW AND REVISE PROPOSED AGREED ORDER.	370.00	0.30	111.00
	SET	WORK ON AGREED ORDERS.	320.00	0.40	128.00
08/13/2021	SET	FOLLOW UP ON A/R REPORT AND STATUS OF COLLECTION.	320.00	0.20	64.00
08/16/2021	MAW	CONFERENCE WITH SUSAN TRENT RE: TURNOVER OF RECORDS NOW; REVIEW EMAIL FROM DOUG ADELSPERGER RE: RECORDS.	370.00	0.30	111.00
	SET	TELEPHONE CALL WITH DOUG ADELSPERGER RE: SETTLEMENT.	320.00	0.40	128.00
	SET	ATTEND HEARING.	320.00	0.50	160.00
08/18/2021	CEW	ORGANIZE ALL INFORMATION RECEIVED ON ACCOUNTS RECEIVABLE OWED, PREPARE COLLECTIONS SPREADSHEET.	170.00	3.30	561.00
	CEW	PREPARE MEMO TO ATTORNEY SUSAN TRENT RE: COLLECTIONS.	170.00	0.50	85.00
08/19/2021	CEW	WORK ON COLLECTION LETTERS, OBTAIN GOOD ADDRESS FOR BUSINESS ENTITIES, REGISTERED AGENTS.	170.00	1.20	204.00
09/20/2021	MAW	REVIEW MOTION, OBJECTION, PREPARE FOR HEARING.	370.00	0.40	148.00
	MAW	ATTEND HEARING ON MOTION FOR TURNOVER.	370.00	0.40	148.00
10/01/2021	MAW	TELEPHONE CONFERENCE WITH ATTORNEY FOR CUSTOMER IN ILLINOIS RE:			

		MECHANIC'S LIEN CLAIM.	370.00	0.30	111.00
10/26/2021	MAW	LEGAL RESEARCH RE: VENUE ISSUE FOR ACCOUNTS RECEIVABLE SUITS.	370.00	1.00	370.00
10/27/2021	MAW	EMAIL TO SUSAN TRENT RE: ACCOUNTS RECEIVABLE.	370.00	0.30	111.00
	CEW	WORK ON ACCOUNTS RECEIVABLE COLLECTIONS, LOOK UP REGISTERED AGENTS, DRAFT DEMAND LETTERS.	170.00	4.00	680.00
11/08/2021	MAW	REVIEW EMAIL FROM ATEEQ KHAN FROM MOBIL TO DEMAND LETTER, REPLY TO SUSAN.	370.00	0.40	148.00
11/14/2022	MAW	REVIEW LETTER FROM ATTORNEY TINAGLIA RE: OFFER OF SETTLEMENT. CONFERENCE WITH CINDY WITTERS RE: SAME.	370.00	0.50	185.00
11/15/2022	CEW	DRAFT MOTION TO APPROVE COMPROMISE WITH PETROLEUM MANAGEMENT TEAM.	170.00	0.70	119.00
	MAW	REVIEW AND REVISE LETTER TO ATTORNEY TINAGLIA ACCEPTING SETTLEMENT OFFER.	370.00	0.20	74.00
	MAW	REVIEW AND APPROVE MOTION TO COMPROMISE.	370.00	0.30	111.00
11/16/2022	CEW	PREPARE NOTICE RE: COMPROMISE WITH PETROLEUM MGMT TEAM.	170.00	0.30	51.00
	CEW	PREPARE PROPOSED ORDER APPROVING COMPROMISE WITH PETROLEUM MGMT TEAM.	170.00	0.20	34.00
	SET	ATTENTION TO BRANSON DUNLOP'S COMMUNICATIONS.	320.00	0.10	32.00
12/13/2022	MAW	REVIEW ORDERS APPROVING SETTLEMENT AND CINDY WITTERS' EMAIL TO PAYOR.	370.00	0.30	111.00
01/24/2023	CEW	DRAFT FOLLOW-UP LETTER TO ATTORNEY TINAGLIA FOR PETROLEUM MANAGEMENT TEAM.	170.00	0.20	34.00
10/13/2023	CEW	PREPARE APPLICATION FOR ACCOUNTANT COMPENSATION.	170.00	0.40	68.00
	CEW	PREPARE PROPOSED ORDER APPROVING ACCOUNTANT COMPENSATION FOR 2021 AND 2022 TAX RETURNS.	170.00	0.20	34.00
10/18/2023	CEW	PREPARE NOTICE RE: ACCOUNTANT FEES.	170.00	0.20	34.00

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<u>TOTAL FEES</u>	53.00	12,748.50
WRITE DOWN TO PROVIDE DISTRIBUTION TO CREDITORS		-8,748.50
<u>NET FEES AFTER DISCOUNT</u>		4,000.00

<u>RECAPITULATION</u>				
<u>TIMEKEEPER</u>	<u>TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>TOTAL</u>
WARSCO, MARK A.	SENIOR COUNSEL	12.30	\$370.00	\$4,551.00
TRENT, SUSAN E.	PARTNER	7.00	320.00	2,240.00
SMITH, PHILLIP W.	ASSOCIATE	8.50	250.00	2,125.00
HEINEY, MADISON M.	LAW CLERK	12.90	135.00	1,741.50
WITTERS, CYNTHIA E.	PARALEGAL	12.00	170.00	2,040.00
SHANE BROOK, BETH A.	PARALEGAL	0.30	170.00	51.00

EXPENSES

04/23/2021	COMPUTERIZED LEGAL RESEARCH WEST PUBLISHING CORPORATION	59.18
04/26/2021	COMPUTERIZED LEGAL RESEARCH WEST PUBLISHING CORPORATION	29.37
	COMPUTERIZED LEGAL RESEARCH	88.55
	<u>TOTAL EXPENSES</u>	<u>88.55</u>
	<u>TOTAL CURRENT INVOICE</u>	<u>4,088.55</u>
	<u>TOTAL BALANCE DUE</u> (includes previous balance amount)	<u>\$4,088.55</u>

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BALANCE DOES NOT REFLECT PAYMENTS REC'D AFTER INVOICE DATE

ACCOUNTS ARE DUE UPON RECEIPT